

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

)	
)	Criminal No. 1:21cr144
)	
UNITED STATES OF AMERICA,)	Count 1: 18 U.S.C. § 1951(a)
)	Conspiracy to Obstruct Commerce by Robbery
v.)	
)	Count 2: 18 U.S.C. §§ 2 & 1951(a)
CORNELIUS CROSSMAN,)	Obstructing Commerce by Robbery
)	
STEPHEN PIERRE PAUL,)	Count 3: 18 U.S.C. §§ 2 and 2119
)	Carjacking
ODANE ALWAYNE BUTLER,)	
)	Count 4: 18 U.S.C. §§ 2 & 924(c)(1)(A)
WAYNE RICARDO TAYLOR,)	Using, Carrying, and Brandishing a Firearm
Defendants.)	During and in Relation to a Crime of Violence
)	
)	Forfeiture Notice
)	

INDICTMENT

June 2021 Term - at Alexandria

Count One

THE GRAND JURY CHARGES THAT:

On or about April 1, 2021, in the Eastern District of Virginia and elsewhere, CORNELIUS CROSSMAN, STEPHEN PIERRE PAUL, ODANE ALWAYNE BUTLER, and WAYNE RICARDO TAYLOR, the defendants, did knowingly and unlawfully combine, conspire, confederate and agree together, and with others known and unknown to the grand jury, to commit an offense against the United States of America, namely, Hobbs Act robbery, in violation of Title 18, United States Code, Section 1951, by obstructing, delaying and affecting commerce by robbery.

Ways, Manner, and Means to Accomplish the Conspiracy

The primary purpose of the conspiracy was to obtain money by hijacking the cargo of a commercial truck traveling in interstate commerce. The ways, manner and means by which this purpose was carried out included the following:

1. It was part of the conspiracy that members of the conspiracy played different roles, took upon themselves different tasks, and participated in the affairs of the conspiracy through various criminal acts.
2. It was further part of the conspiracy that members of the conspiracy obtained weapons to rob a commercial truck traveling interstate through Virginia.
3. It was further part of the conspiracy that members of the conspiracy used force to steal the commercial truck during the robbery at a truck fueling stop in Virginia.
4. It was further part of the conspiracy that members of the conspiracy, armed with a weapon, chased down and assaulted the driver, beat the driver and ultimately bound him and placed him in a van they had arrived in together.
5. It was further part of the conspiracy that members of the conspiracy, armed with weapons, having also seized a firearm belonging to the driver, took control of the commercial truck and traveled through Virginia in the direction of New York during the robbery.
6. It was further part of the conspiracy that members of the conspiracy, armed with weapons, stole approximately 91 boxes of assorted cigarettes containing 8,929 cartons and 89,929 packs of cigarettes belonging to the commercial truck travelling through Virginia.
7. It was further part of the conspiracy that members of the conspiracy fled the scene of the robbery in the stolen commercial truck to avoid apprehension and ensure the continuing existence and success of the conspiracy.

Overt Acts

In furtherance of the conspiracy and to effect the objects thereof, the defendants committed overt acts in the Eastern District of Virginia and elsewhere, including, but not limited to, the following:

1. On or about April 1, 2021, in Mount Jackson, Virginia, CORNELIUS CROSSMAN, STEPHEN PIERRE PAUL, ODANE ALWAYNE BUTLER, and WAYNE RICARDO TAYLOR, brandishing a loaded Taurus Model PT111 9mm, serial number TKN20224, and with force and threats against the owner/operator, M.S.D., stole a red 2013 Freightliner Cascadia commercial truck with Alabama license plate 1153504 with Easy Transpo, LLC, affixed to the door and orange 2004 Wabash semi-trailer with Alabama license plate 1TR2588A,

2. On or about April 1, 2021, near Mount Jackson, Virginia, CORNELIUS CROSSMAN, STEPHEN PIERRE PAUL, ODANE ALWAYNE BUTLER, and WAYNE RICARDO TAYLOR, brandishing a loaded Taurus Model PT111 9mm, serial number TKN20224, and with force and threats of force against M.S.D., took M.S.D.'s Taurus 9mm, Model G3, serial number ABM257962, bound him and shoved him into a van CROSSMAN, PAUL, BUTLER, and TAYLOR had arrived in together.

3. On or about April 1, 2021, CORNELIUS CROSSMAN, STEPHEN PIERRE PAUL, ODANE ALWAYNE BUTLER, and WAYNE RICARDO TAYLOR, using the stolen commercial truck and their original vehicle, a black 2004 Ford van with Florida license plate QSPN990, traveled to Interstate 66 east bound in the direction of New York.

4. On or about April 1, 2021, in Fairfax, Virginia, CORNELIUS CROSSMAN, STEPHEN PIERRE PAUL, ODANE ALWAYNE BUTLER, and WAYNE RICARDO TAYLOR, traveling inside the stolen truck and their original van and driving east bound on

Interstate 66, were stopped on Interstate 66 near the Route 28 and Nutley Street, in Fairfax County, Virginia, by law enforcement when an unknown conspirator fled in an effort to avoid apprehension.

(All in violation of Title 18, United States Code, Section 1951(a).)

Count Two

THE GRAND JURY FURTHER CHARGES THAT:

On or about, April 1, 2021, in Fairfax County, Virginia, within the Eastern District of Virginia, and elsewhere, CORNELIUS CROSSMAN, STEPHEN PIERRE PAUL, ODANE ALWAYNE BUTLER, and WAYNE RICARDO TAYLOR, the defendants, with intent to cause death and serious bodily harm, did take a motor vehicle, specifically a red 2013 Freightliner Cascadia commercial truck with Alabama license plate 1153504 with Easy Transpo, LLC, affixed to the door and orange 2004 Wabash semi-trailer with Alabama license plate 1TR2588A, that had been transported, shipped, and received in interstate commerce from the person and presence of another, specifically, M.S.D., a continuing criminal offense, by force and violence and by intimidation, namely, while brandishing a loaded black Taurus Model PT111 9mm, serial number TKN20224 and a black Taurus 9mm, Model G3, serial number ABM257962.

(In violation of Title 18, United States Code, Sections 2 and 2119.)

Count Three

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 1, 2021, in Fairfax County, Virginia, within the Eastern District of Virginia, and elsewhere, CORNELIUS CROSSMAN, STEPHEN PIERRE PAUL, ODANE ALWAYNE BUTLER, and WAYNE RICARDO TAYLOR, the defendants, did unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully take and obtain a commercial vehicle and cargo consisting of a red 2013 Freightliner Cascadia commercial truck with Alabama license plate 1153504 with Easy Transpo, LLC, affixed to the door and orange 2004 Wabash semi-trailer with Alabama license plate 1TR2588A, and cargo of 91 boxes containing 8,929 cartons containing 89,929 packs of assorted cigarettes traveling interstate inside the semi-trailer of a commercial truck operated by owner M.S.D. in the presence of M.S.D. and against his will by means of actual and threatened force, violence, and fear of immediate and future injury to his person, while he was engaged in commercial activities as an owner/operator of an eighteen wheel tractor trailer, a business that was engaged in and that affected interstate commerce.

(In violation of Title 18, United States Code, Sections 2 and 1951(a).)

Count Four

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 1, 2021, in Fairfax County, Virginia, within the Eastern District of Virginia, and elsewhere, CORNELIUS CROSSMAN, STEPHEN PIERRE PAUL, ODANE ALWAYNE BUTLER, and WAYNE RICARDO TAYLOR, the defendants, did knowingly use, carry, and brandish firearms, to wit two loaded black Taurus 9 mms semi-automatic handguns, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely:

- a. Carjacking, in violation of Title 18, United States Code, Section 2119, as set forth and charged in Count Two of this Indictment; and
 - b. Interference with commerce by robbery, in violation of Title 18, United States Code, Section 1951, as set forth and charged in Count Three of this Indictment;
- and did aid, abet, counsel, command, induce, and cause another to commit said offenses.

(In violation of Title 18, United States Code, Sections 2 and 924(c)(1)(A).)

FORFEITURE NOTICE

The GRAND JURY HEREBY FINDS probable cause that the property described in this NOTICE OF FORFEITURE is subject to forfeiture pursuant to the statutes described:

Pursuant to Fed. R. Crim. P. 32.2(a) the defendants, CORNELIUS CROSSMAN, STEPHEN PIERRE PAUL, ODANE ALWAYNE BUTLER, and WAYNE RICARDO TAYLOR, if convicted on Counts One and Two of this Indictment, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds of the offenses charged in those counts

Pursuant to Fed. R. Crim. P. 32.2(a), the defendants, CORNELIUS CROSSMAN, STEPHEN PIERRE PAUL, ODANE ALWAYNE BUTLER, and WAYNE RICARDO TAYLOR, are hereby notified that if convicted of the violation set forth in Count Three of this Indictment, they shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(5), any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of such violation.

Pursuant to Fed. R. Crim. P. 32.2(a), the defendants, CORNELIUS CROSSMAN, STEPHEN PIERRE PAUL, ODANE ALWAYNE BUTLER, and WAYNE RICARDO TAYLOR, are hereby notified that if convicted of any of the violations set forth in this Indictment, they shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in or used in the commission of the offense. The assets subject to forfeiture include, but are not limited to, the following: a black Taurus Model PT111 9mm, serial number TKN20224, and all accompanying magazines and ammunition.

Pursuant to Fed. R. Crim. P. 32.2(a), the defendants, CORNELIUSCROSSMAN, STEPHEN PIERRE PAUL, ODANE ALWAYNE BUTLER, and WAYNE RICARDO TAYLOR, are hereby notified that if convicted of of the violation set forth in Count Three of this Indictment, they shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(5), any property, real or personal, which represents or is traceable to the gross proceeds obtained, directly or indirectly, as a result of such violation.

Pursuant to Fed. R. Crim. P. 32.2(a), the defendants, CORNELIUSCROSSMAN, STEPHEN PIERRE PAUL, ODANE ALWAYNE BUTLER, and WAYNE RICARDO TAYLOR, are hereby notified that if convicted of any of the violations set forth in this Indictment, they shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), all firearms and ammunition involved in or used in the commission of the offense. The assets subject to forfeiture include but are not limited to a black Taurus Model PT111 9mm, serial number TKN20224, and all accompanying magazines and ammunition.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendants shall forfeit substitute property, up to the value of the amount described above, if by any act or omission of the defendants, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred, sold, or substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

(Pursuant to Title 18, United States Code, Sections 924(d)(1) and 981(a)(1)(C); and Title 28, United States Code, Section 2461(c); and Rule 32.2(a), Federal Rules of Criminal Procedure.)

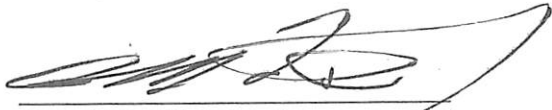
A TRUE BILL

**Pursuant to the E-Government Act,
The original of this page has been filed
under seal in the Clerk's Office**

Foreperson of the Grand Jury

Raj Parekh
Acting United States Attorney

By:



Ronald L. Walutes, Jr.
Assistant United States Attorney